

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re:)
)
) **CASE NO. 20-13888-amc**
Jesse Davis)
and) **JUDGE Ashely M. Chan**
Ebony Davis)
)
Debtor)

**NEWREZ LLC D/B/A SHELLPOINT MORTGAGE SERVICING NOTICE OF
DEBTOR’S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing (“Creditor”), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor’s request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtors recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting February 1, 2021 through April 1, 2021. Creditor holds a secured interest in real property commonly known as 77 Candee Rd, Naugatuck, Connecticut 06770 as evidenced by claim number 10-1 on the court’s claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning May 1, 2021 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance

arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

Authorized Agent for Secured Creditor
130 Clinton Rd #202,
Fairfield, NJ 07004
Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esq.
Email: cwohlab@raslg.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 25, 2021, I caused to be electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

**Jesse Davis
404 Caldwell Cir.
Exton, PA 19341**

**Ebony Davis
404 Caldwell Cir.
Exton, PA 19341**

And via electronic mail to:

**DIANE S. TOSTA
Diane S. Tosta, Esq.
P.O. Box 618
Eagleville, PA 19408**

**SCOTT F. WATERMAN (Chapter 13)
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606**

**United States Trustee
Office of United States Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106**

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esq.
Email: cwohlrab@raslg.com